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Attorneys for Defendants  
Leigafoali'i Tafue Williams  
And Papu Christopher Williams

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

DEUTSCHE BANK NATIONAL	)	CIVIL NO. 11-00632 JMS RLP
TRUST COMPANY, AS TRUSTEE	)	
MORGAN STANLEY ABS	)	DEFENDANTS WILLIAMS'
CAPITAL I INC. TRUST 2007-NC1	)	<b>MOTION TO DISMISS</b>
MORTGAGE PASS-THROUGH	)	<b>COMPLAINT</b> FILED 10/20/11;
CERTIFICATES, SERIES 2007-NC1,	)	MEMORANDUM IN SUPPORT OF
	)	MOTION; DECLARATION OF
Plaintiff,	)	GRETCHEN H. KLUNGNESS;
	)	EXHIBITS A – F and EXHIBIT U;
vs.	)	CERTIFICATE OF SERVICE
	)	
LEIGAFOALI'I TAFUE WILLIAMS,	)	
fka LEIGAFOALI'I TAFUE	)	
KOEHNEN; PAPU CHRISTOPHER	)	

WILLIAMS; REAL TIME )  
RESOLUTIONS, INC.; CAROLYN )  
RUTH KOEHNEN, AS TRUSTEE OF )  
THE CAROLYN R. KOEHNEN )  
REVOCABLE LIVING TRUST U/A, )  
DATED APRIL 14, 1986; and JOHN )  
DOES 1-5, )  
 )  
Defendants. )  
\_\_\_\_\_ )

DEFENDANTS WILLIAMS'  
MOTION TO DISMISS COMPLAINT FILED 10/20/11

Come now Defendants Leigafoali'i Tafue Williams and Papu Christopher Williams, by and through their attorneys, James J. Bickerton and Stanley H. Roehrig, and moves this Court for an order pursuant to Rule 12b (1) FRCP dismissing the case herein for the reasons that:

1. There is in fact no complete diversity;
2. Plaintiff in fact has no standing to foreclose; and
3. A case involving the same issues, without final judgment, is now pending in state court after remand from this Court in Civil No. 09-00535 SOM KSC.

This motion is based on the above-referenced rule, the memorandum in support of the motion, and the exhibits and declarations attached thereto.

DATED: Honolulu, Hawaii, December 19, 2011.

*/s/ JAMES J. BICKERTON*

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JAMES J. BICKERTON  
Attorney for Defendants Leigafoali'i Tafue  
Williams and Papu Christopher Williams